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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Implementation of Section )  
309(j) of the Communications )  
Act Competitive Bidding )

PP Docket No. 93-253

DOCKET FILE COPY ORIGINAL

To: The Federal Communications Commission

**SOUTHWESTERN BELL CORPORATION**  
**MOTION FOR EXTENSION OF TIME**

COMES NOW Southwestern Bell Corporation by its attorneys and respectively requests extension of time for the filing of Reply Comments in this Docket, currently due on November 24, 1993, and in support whereof states:

1. On November 10, 1993, at least 186 parties filed initial comments in this Docket in response to the Commission's Notice of Proposed Rulemaking released October 12, 1993. These comments totalled approximately 5,000 pages of commentary, including a number of technical economic analyses. The comments, which were filed in response to the Commission's Notice of Proposed Rulemaking (NPRM), which itself was over 63 pages long, with 181 paragraphs, were prepared in the 29 days between the release of the NPRM and November 10, 1993. Although the industry had been informed of the general nature of the Commission's Notice in the September 23, 1993 Open Meeting, the NPRM contained a substantial number of details regarding the competitive bidding process which were not made public until the NPRM was released.

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2. While other branches of the Federal Government have some experience with auctioning of public resources, this is the first such endeavor for the Federal Communications Commission. The dynamics of competitive auctioning as well as the specific auction procedures are totally different from both the comparative hearing and lottery processes which the Commission has conducted in the past to allocate spectrum. Given this, it should be clear that two weeks to reply to the initial comments is simply inadequate.

3. The minimum deposit payments proposed for spectrum for personal communication services will amount to nearly half a billion dollars; the estimated revenues from these auctions are gauged by some to approach nearly \$10 billion. Obviously, every detail of the competitive bidding procedures must be carefully considered and calculated by the Commission and the industry in order that the most fair and efficient methods possible are adopted.

4. Therefore, SBC respectfully requests the Commission to grant a one week extension of time from the filing date for reply comments in this docket. SBC submits that this extension of time will not significantly delay the Commission's deliberation on this matter, given that the current due date falls on the day before Thanksgiving. It is likely that an analysis of these filings will not begin before November 29 or November 30 at the earliest. Therefore, the requested seven day extension will likely have only a one or two day impact on the Commission's review.

Further, while SBC understands that the Congress has set an ambitious timeline for implementation of the legislation, procedures for competitive bidding need not be in place until early March, 1994, giving the Commission three full months to deliberate even with the an extension . When one compares that period of time to the period of time that the parties had been given to analyze each other's position, the equity of the extension seems obvious.

5. Finally, SBC points out that the usual pleading cycles allow a full month for reply comments. The importance of reply comments in a docket such as this cannot be underestimated, given the interdependence of a great many of the details of the competitive bidding procedures and the fact that the NPRM is the first opportunity for the industry to formally address the specifics of a competitive bidding approach for wireless spectrum with this Commission.

WHEREFORE, SBC respectfully requests the Commission to extend the filing date for Reply Comments herein from November 24, 1993 to December 1, 1993.

Respectively submitted,

SOUTHWESTERN BELL CORPORATION

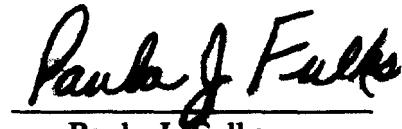
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**CERTIFICATE OF SERVICE**

I, Paula J. Fulks, hereby certify that copies of the foregoing Motion for Extension of Time of Southwestern Bell Corporation have been postage prepaid, on the parties listed on the attached.

  
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